

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

MIRCEA CONSTANTINESCU,
NIKOLAOS LIMBERATOS, and
ALEXANDRU RADULESCU,

Defendants.

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3500 PROTECTIVE ORDER

19 Cr. 651 (SHS)

Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Elizabeth Hanft, Maggie Lynaugh, and Samuel P. Rothschild, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500, *Giglio v. United States*, 405 U.S. 150 (1972), and the Government's general disclosure obligations, relating to (1) witnesses the Government anticipates may be called to testify at trial ("3500 Material"), and (2) individuals the Government does not anticipate calling at trial ("Other Witness Material"), IT IS HEREBY ORDERED that:

(1) Defense counsel must destroy or return to the Government all 3500 Material and Other Witness Material (and any copies thereof) at the conclusion of the trial of this matter or

when any appeal has become final;

(2) The defense and the defendants are precluded from disseminating any of the 3500 Material and Other Witness Material (and any copies thereof) to anyone beyond the defendants, defense counsel, and any paralegal or staff employed by the defense;

(3) The defendants are precluded from taking or keeping any copies (paper or electronic) of the 3500 Material and Other Witness Material with them into any jail facility, whether before, during, or after trial, except that the defendants may review copies of the 3500 Material and Other Witness Material in the possession of defense counsel or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense; and

(4) The Government may mark certain 3500 Material and certain Other Witness Material "ATTORNEYS' EYES ONLY" where the Government has a good faith basis to believe that the absence of such designation is reasonably likely to pose risks to individuals' safety and/or to jeopardize ongoing law enforcement investigations. 3500 Material or Other Witness Material marked "ATTORNEYS' EYES ONLY" shall not be disseminated to the defendants or anyone else beyond defense counsel and any paralegal or staff employed by the defense—nor shall the names of witnesses reflected

in such designated 3500 Material or Other Witness Material be disclosed to the defendants—unless with the Government's consent or by further order of the Court on defense application.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney

By: Samuel P. Rothschild
Elizabeth Hanft
Maggie Lynaugh
Samuel P. Rothschild
Assistant United States Attorneys

Date: May 27, 2022

MIRCEA CONSTANTINESCU

By: Meredith Heller
Meredith Heller, Esq.

Date: May 31, 2022

NIKOLAOS LIMBERATOS

By: _____
Jeffrey Lichtman, Esq.
Jeffrey Einhorn, Esq.
Alan Seidler, Esq.

Date: _____

ALEXANDRU RADULESCU

By: _____
James Branden, Esq.

Date: _____

SO ORDERED:

Dated: New York, New York
May ____, 2022

THE HONORABLE SIDNEY H. STEIN
UNITED STATES DISTRICT JUDGE

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney

By: Samuel P. Rothschild
Elizabeth Hanft
Maggie Lynaugh
Samuel P. Rothschild
Assistant United States Attorneys

Date: May 27, 2022

MIRCEA CONSTANTINESCU

By: _____
Meredith Heller, Esq.

Date: _____

NIKOLAOS LIMBERATOS

By: [Signature]
Jeffrey Lichtman, Esq.
Jeffrey Einhorn, Esq.
Alan Seidler, Esq.

Date: 5/31/22

ALEXANDRU RADULESCU

By: _____
James Branden, Esq.

Date: _____

SO ORDERED:

Dated: New York, New York
May __, 2022

THE HONORABLE SIDNEY H. STEIN
UNITED STATES DISTRICT JUDGE

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney

By: Samuel P. Rothschild
Elizabeth Hanft
Maggie Lynaugh
Samuel P. Rothschild
Assistant United States Attorneys

Date: May 27, 2022

MIRCEA CONSTANTINESCU

By: _____
Meredith Heller, Esq.

Date: _____

NIKOLAOS LIMBERATOS

By: _____
Jeffrey Lichtman, Esq.
Jeffrey Einhorn, Esq.
Alan Seidler, Esq.

Date: _____

ALEXANDRU RADULESCU

By: James Braden, Jr.
James Braden, Jr.

Date: 5/31/2022

SO ORDERED:

Dated: New York, New York
June 1, 2022

Sidney H. Stein
THE HONORABLE SIDNEY H. STEIN
UNITED STATES DISTRICT JUDGE